

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

Case No. 1:20 Civ. 484

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA WPC
LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON NELSON;
CASEY KIRSCHNER; ALLCORE
DEVELOPMENT LLC; FINBRIT HOLDINGS
LLC; CHESHIRE VENTURES LLC; JOHN
DOES 1-20,

Defendants.

**MOTION OF DEFENDANTS CARLETON NELSON AND CASEY KIRSCHNER
TO TRANSFER VENUE**

Defendants Carleton Nelson and Casey Kirschner respectfully move under 28 U.S.C. § 1404(a) to transfer this case to the United States District Court for the Western District of Washington, Seattle Division. The other defendants that have appeared in this action, Brian Watson and WDC Holdings LLC, consent to this motion. Plaintiffs Amazon.com, Inc., and Amazon Data Services, Inc. (collectively, “Amazon”) do not.

Amazon has sued Mr. Nelson and Mr. Kirschner in Virginia for, among other things, breach of contract. In doing so, Amazon itself has breached the very agreements that it seeks to enforce against Mr. Nelson and Mr. Kirschner. Those agreements make the State of

Washington—not Virginia—the “exclusive” venue for any dispute “related to” the agreements.

Mr. Nelson and Mr. Kirschner thus seek to hold Amazon to the very agreements it seeks to enforce.

Dated: September 21, 2020

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. On September 21, 2020, I will further send the document and a notification of such filing (NEF) to the following parties by e-mail:

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